

REMARKS

Applicant appreciates the thorough review of the present application as reflected in the Official Action mailed December 12, 2003. However, for the reasons discussed below, Applicant submits that the present application is neither anticipated nor obvious in light of the cited references.

Applicant has added new Claims 17 through 19 that are system and computer program product claims corresponding to method Claim 7. Claim 14 has been amended to correct a misspelling. Claim 11 has been amended to clarify that the user defined function (UDF) is a UDF of the database.

The Claims Are Not Anticipated

Claims 1-5, 9-13, 15 and 16 stand rejected under 35 U.S.C. § 102(e) as anticipated by United States Patent No. 6,658,453 to Dattatri (hereinafter "Dattatri"). Official Action, p. 2.

Independent Claim 1

In particular, Claim 1 stands rejected based on col. 2, lines 55-67 of Dattatri. Claim 1 recites:

1. (Original) A method of generating an electronic mail message, comprising:
automatically **generating an electronic mail message** responsive to an **action being performed on a database entry**.

(emphasis added). Applicant submits that at least the highlighted portions of Claim 1 are neither disclosed nor suggested by the cited portions of Dattatri.

As discussed in the present specification, Applicant is not claiming merely the automatic generation of an e-mail message based on the occurrence of an event but is claiming the automatic generation of an e-mail message based on a specific action. In particular, Claim 1 recites that the e-mail is generated responsive to **an action being performed on a database entry**, as opposed to merely generating an e-mail based on contents of a database. As discussed below, Applicant submits that Dattatri does not disclose this specific condition and, therefore, does not anticipate Claim 1.

In its entirety, the cited portion of Dattatri recites:

Referring to FIG. 1, a preferred embodiment of the invention allows a client 101 to create and monitor agents placed on server 105 across a computer network 104 such as the Internet or an intranet. These agents monitor specific asynchronous events on a server 105 and perform user specified tasks in response to these events, e.g., e-mailing a reminder message to the client on a certain date.

A client can only view documents on a server across a computer network using traditional server products. The server provides services only as long as the client is connected to the server. In other words, the client-server transactions are synchronous. However, in many situations, it would be desirable to have an asynchronous server response.

Dattatri, col. 2, lines 55-67. The cited portion of Dattatri describes an agent that can perform a user specified task in response to an event, such as e-mailing a reminder message. The cited portion of Dattatri does not disclose that the e-mail message be generated "responsive to an action being performed on a database entry" as recited in Claim 1.

While Dattatri does state that the agent can be triggered by "complex events generated by relational databases," Dattatri's list of possible events does not state that performing an action on a database entry would be such a complex event. *See* Dattatri, col. 4, line 58 to col. 5, line 30. Accordingly, Applicant submits that Claim 1 is not anticipated by Dattatri.

While Claims 2-5, 9 and 10 are patentable as depending from Claim 1, Applicant also submits that certain of these claims are separately patentable over Dattatri. For example, Claim 2 recites:

2. (Original) The method of Claim 1, wherein the step of generating an electronic mail message comprises:
detecting performance of the action performed on the entry in the database;
triggering a user defined function (UDF) of the database which provides access to an electronic mail system in response to the detection of performance of the action on the entry; and
accessing the electronic mail system utilizing the UDF to request generation of the electronic mail message responsive to the UDF being triggered.

Claim 2 recites a specific configuration of a database for the automatic generation of an e-mail. In particular, Claim 2 recites that a UDF of the database is used to access the electronic mail system responsive to the detection of performance of the action on the database entry.

In rejecting Claim 2, the Official Action cites to col. 5, lines 23-40 as teaching "detecting performance of the action performed on the entry in the database." Official Action, p. 2. However, this portion of Dattatri merely describes the ability of agents to detect events and states that agents can only register for events that are published by a server. This portion of Dattatri does not disclose or suggest that an event be detection of an action being performed on an entry in a database as is recited in Claim 2.

The Official Action cites to col. 10, lines 1-5 as disclosing triggering a UDF as recited in Claim 2. Official Action, p. 3. However, the cited portion of Dattatri states:

When an agent is triggered, the specified action is performed. If the action involves sending a mail message to some address, the mail message will identify the creator of the agent (the client that submitted the agent) that caused the message to be sent.

Dattatri, col. 10, lines 1-5. While this portion of Dattatri does describe an agent sending a mail message, it does not describe the agent as a UDF of a database as recited in Claim 2.

Finally, the Official Action cites to col. 12, lines 1-56 of Dattatri as teaching accessing the electronic mail system as recited in Claim 2. Official Action, p. 3. However, this section of Dattatri does not describe the use of a database UDF to access an electronic mail system.

In light of the above discussion, Applicant submits that Claim 2 is not anticipated by Dattatri for at least these additional reasons.

With regard to Claim 3, Applicant submits that, although Dattatri does use the word "trigger" in the cited portions, it does not refer to a database trigger. As such, Claim 3 is not anticipated by Dattatri for at least these additional reasons.

Independent Claim 11

Independent Claim 11 stands rejected based on col. 3, lines 1-23, col. 5, lines 24-30 and col. 6, lines 5-7 and 9-11 of Dattatri. Official Action, p. 4. Claim 11 recites:

11. (Original) A system for generating an electronic mail message, comprising:

a database having database entries;
a user defined function of the database configured to wrap access to an electronic mail system so as to generate an electronic mail message upon invocation of the user defined function; and
a database trigger associated with at least one of the database entries and configured to **invoke the user defined function upon performance of an action on the at least one of the database entries.**

(emphasis added). Applicant submits that at least the highlighted portions of Claim 11 are neither disclosed nor suggested by the cited portions of Dattatri.

Corresponding recitations are found in independent Claims 15 and 16.

In rejecting Claim 11, the Official Action states that col. 5, lines 24-30 and col. 6, lines 9-11 teach the user defined function of Claim 11. These cited portions of Dattatri state:

A sophisticated user might submit a Java/JavaScript program to detect events and trigger the agent. Again, a user would not be allowed to submit any Java program as part of an agent. Servers provide specific Java/JavaScript programs that clients can use in their agents. The available set of such Java/JavaScript programs are determined by the server administrator.

Dattatri, col. 5, lines 24-30; and

Sending an email message, fax, page, etc., all require similar Application Programming Interfaces (API) on the server.

Dattatri, col. 6, lines 9-11. Applicant submits that these portions of Dattatri do not describe the use of a UDF of a database to wrap access to an e-mail system but, instead, describe the use of a JavaScript or Java to detect program events and trigger an agent. The agent is not described as a database UDF. As such, Applicant submits that the cited portions of Dattatri do not disclose or suggest the specific use of a database UDF as recited in Claim 11.

The Official Action further cites to col. 6, lines 5-7 of Dattatri as teaching the use of a database trigger as recited in Claim 11. This cited portion of Dattatri states:

Submit another agent to run on the server.
Execute a server supplied Java/JavaScript program when triggered.

Dattatri, col. 6, lines 5-7. This portion of Dattatri describes actions that may be taken by an agent. It does not describe using a database trigger that detects performance of an action on a database entry and then invoke a UDF as recited in Claim 11.

In light of the above discussion, Applicant submits that Claims 11, 15 and 16 are not anticipated by Dattatri and, therefore, requests withdrawal of the present rejections. Applicant further submits that the dependent claims are patentable at least as depending from a patentable base claim.

The Claims Are Not Obvious

Claims 6 and 14

Claims 6 and 14 stand rejected under 35 U.S.C. § 103 as obvious in light of Dattatri and United States Published Patent Application 2002/0120690 to Block (hereinafter "Block"). Applicant submits that Claims 6 and 14 are patentable at least as depending from a patentable base claim.

Claims 7 and 8

Claims 7 and 8 stand rejected under 35 U.S.C. § 103 as obvious in light of Dattatri and United States Published Patent Application 2002/0138497 to Chen *et al.* (hereinafter "Chen"). Applicant submits that Claims 7 and 8 are patentable at least as depending from a patentable base claim. Applicant also notes that Chen is assigned to International Business Machines Corporation, the assignee of the present application. Accordingly, Chen may not be used in a rejection under 35 U.S.C. § 103 against the present application.

The New Claims

Applicant has added new Claims 17 through 19 that depend from Claims 11, 15 and 16 respectively. The new claims correspond to language from Claim 7 and, therefore, are patentable over the cited references for reasons analogous to those discussed above with reference to Claim 7.

Conclusion

In light of the above discussion, Applicant submits that the present application is in condition for allowance, which action is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

In re: Robert Russell Cutlip
Serial No.: 09/867,911
Filed: May 30, 2001
Page 10 of 10

It is not believed that an extension of time and/or additional fee(s)-including fees for net addition of claims-are required, beyond those that may otherwise be provided for in documents accompanying this paper. In the event, however, that an extension of time is necessary to allow consideration of this paper, such an extension is hereby petitioned under 37 C.F.R. §1.136(a). Any additional fees believed to be due in connection with this paper may be charged to our Deposit Account No. 09-0461.

Respectfully submitted,



Timothy J. O'Sullivan
Registration No. 35,632

Customer Number: 20792

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on March 5, 2004.



Traci A. Brown

Date of Signature: March 5, 2004